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December 17, 2024

Via ECF

Honorable Thomas I. Vanaskie, Special Master
Stevens & Lee, P.C.
1500 Market Street, East Tower, 18th Floor
Philadelphia, Pennsylvania 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability
Litigation*, No. 1:19-md-02875 (D.N.J.)

Dear Judge Vanaskie:

Please accept this agenda letter on behalf of the Plaintiffs in advance of the
December 18, 2024 status conference.

1. Wave Two Bellwether Pool.

The Court's December 16, 2024 Order selected 5 cases for inclusion within
Wave 2. One of the selected cases, Georgia Murawski (No. 20-cv-14302), appears
to lack diversity as Ms. Murawski is a Delaware resident and has sued Princeton and

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Solco, among others, who are Delaware corporations. Additionally, a second plaintiff, Paulette Kennedy (1:20-cv-7638), has sued Mylan who has refused to waive its *Lexecon* rights. Therefore, Plaintiffs suggest that the Court randomly select an additional 2 cases for inclusion within Wave 2. The Parties met and conferred last week and agreed to a set of plaintiffs who do not appear to lack diversity and whose claims do not implicate Mylan or Aurobindo defendants. As such, Plaintiffs propose the Court select an additional 2 cases from the following list of plaintiffs:

1. Bonmon, Yolanda
2. Crawford, Rita
3. Garcia, Robert
4. Lee, Robert
5. Smalls, Evons
6. Suits, James
7. Weygandt, Robert

2. Plaintiffs' Update Regarding Certificates of Analysis and Document Protocols

The Parties are continuing to meet and confer regarding a potential stipulation. ZHP's counsel proposed general language during the Parties' December 17, 2024 meet and confer, and Plaintiffs provided their input. ZHP's counsel agreed to propose more specific language, and the Parties agreed to provide a further update

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during the first week of January 2025. Plaintiffs propose January 8, 2025, to submit that update, if acceptable to the Court.

Respectfully,

A handwritten signature in blue ink, appearing to read "Adam M. Slater", written over a horizontal line.

Adam M. Slater
Plaintiffs' Liaison Counsel

Cc: Counsel of record (via ECF)